

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:
Dettinger et al

Serial No.: 10/718,218

Confirmation No.: 9017

For: NATURAL LANGUAGE
SUPPORT FOR DATABASE
APPLICATIONS

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Filed: November 20, 2003

Group Art Unit: 2166

Examiner: Khanh B. Pham

MAIL STOP APPEAL BRIEF - PATENTS
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

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February 27, 2008
Date

/John C. Garza/
John C. Garza

REPLY BRIEF

Applicants submit this Reply Brief to the Board of Patent Appeals and Interferences in response to Examiner's Answer mailed on December 27, 2007. While Applicants' maintain each of the arguments submitted in Applicants' previously submitted Appeal Brief, Applicants make the following further arguments in light of the Examiner's Answer. Please charge any additional fees that may be required to make this Reply Brief timely and acceptable to Deposit Account No. 09-0465/ROC920030251US1.

ARGUMENTS

1. Claims 1, 3-4, 6-8,10-19, 20-23, 25-27 and 29-41 are not anticipated by Kawakura et al. (US 2004/0034521 A1), hereinafter "*Kawakura*," under 35 U.S.C. § 102(e).

The Applicable Standard

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

The Examiner's Arguments

On pages 10-15 of an *Examiner's Answer*, the Examiner provides elaboration with respect to the Examiner's previously submitted arguments, suggesting that Applicants' arguments are not persuasive. In response, Applicants respectfully maintain that each of the arguments presented in *Applicants' Appeal Brief* are correct, and further provide the following arguments in response to the Examiner's Answer.

Applicants' Response to Examiner's Arguments

Regarding claims 1, 20, 25, 39 and 40, the Examiner states "Kawakura teaches at [0079]-[0081] the step of creating a database in a specific language to handle user's request in accordance with security setting for a group of users" (*Examiner's Answer*, page 12). The cited material states:

[0079] FIG. 26 shows the request data for opening a new account as transmitted from the relay server to the server system in accordance with the third embodiment

[0080] FIGS. 27A to 27C show exemplary data of new customers and account data registered in the server system in accordance with the third embodiment.

[0081] FIG. 28 shows the response data for opening a new account as transmitted from the server system to the relay server in accordance with the third embodiment.

Clearly, the cited material does not teach the step described by the Examiner. In fact, Applicants submit that *Kawakura* as a whole fails to teach “creating a database...” as asserted by the Examiner. Rather, *Kawakura* is directed to a relay server that translates data communications in transit. More specifically, *Kawakura* discloses “a relay server 3 located between an existing server system 1 and an existing client system 2 in order to enable the existing server system 1 to be used in different languages” (*Kawakura* [0121]). As shown in Figure 6, *Kawakura* teaches “[t]he data generating section 37 serves to replace data items, which can be replaced, with respect to server data (response data) as obtained from the server system 1 to generate data to be transferred to the client system 2” (*Kawakura* [0136]). In other words, *Kawakura* teaches that certain data items sent by a server are translated by the relay server before the response is sent to client system. In such a system, there is no use for creating a new data abstraction model. Thus, Applicants respectfully submit that *Kawakura* fails to teach “*creating an effective data abstraction model by modifying [another] data abstraction model,*” as recited in the claims.

Regarding the recited limitation of a “security setting for a group of users,” the Examiner asserts:

Kawakura teaches at [0177] that before accessing data from the database in a designated language, user is required to input his ID/password and designates a language for use in this session (i.e., “security setting”). The system will determine whether the user belong to group of authorized user and creates a database in the designated language.

Examiner's Answer, page 12. Here, the Examiner fails to provide any basis for asserting “[t]he system will determine whether the user belong to group of authorized user and creates a database in the designated language.” Applicants submit that this conclusory statement is not supported by *Kawakura*. In particular, Applicants submit

that *Kawakura* [0177], as well as *Kawakura* as a whole, does not in any way disclose a "security setting for a group of users." However, even if we assume, *arguendo*, that a user's "ID/password" somehow teaches a "security setting for a group of users," *Kawakura* does not teach creating an effective data model according to the user's "ID/password." Thus, Applicants respectfully submit that *Kawakura* does not teach or suggest *"creating an effective data abstraction model by modifying the data abstraction model in accordance with a view that reflects one or more security settings for a group of users,"* as recited in claims 1, 20, 25, 39 and 40.

Regarding claims 6, 17, 36 and 41, the Examiner states "*Kawakura* also teaches at Fig. 18 above a plurality of language components 35a-f for translating the database's logical fields and the translation displayed is dependent on which language files 35a-35f are loaded (i.e. the language resource file is designated by users 2a-2f as discussed above)" (*Examiner's Answer*, pages 13-14). Applicants submit that items "35a-35f", shown in *Kawakura* Fig. 18, are not in any way described as "language resource files," or files of any sort. In fact, the Examiner's assertion is entirely unsupported by *Kawakura* generally. Accordingly, Applicants respectfully submit that *Kawakura* does not teach *"displaying one of the second natural language expressions to a user, wherein which of the two or more second natural language expressions is displayed depends upon which natural language expression files are loaded to define a language resource component associated with the data abstraction model,"* as recited in the claims.

For these reasons, Applicants submit claims 1, 20, 25, 39, 40, 6, 17, 36 and 41, as well as their dependents, are allowable, and respectfully request withdrawal of this rejection.

2. Claims 5, 9, 24 and 28 are not unpatentable over *Kawakura* as applied to claims above, and in view of *Inanoria* (US 2004/0046789 A1), under 35 U.S.C. § 103(a).

Claims 5, 9, 24 and 28 depend, directly or indirectly, on claims that are believed to be allowable, for reasons discussed above. Accordingly, Applicants submit these claims are also allowable and respectfully request withdrawal of this rejection.

CONCLUSION

The Examiner errs in finding that:

1. Claims 1, 3-4, 6-8, 10-19, 20-23, 25-27 and 29-41 are anticipated by *Kawakura*; and
2. Claims 5, 9, 24 and 28 are unpatentable over *Kawakura* in view of *Inanoria*.

Withdrawal of the rejections and allowance of all claims is respectfully requested.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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